



SINCE 1922

**MUTUAL LIQUID GAS & EQUIPMENT CO., INC.**

April 17, 2001

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California Environmental Protection Agency  
Air Resources Board  
9528 Telstar Avenue  
El Monte, CA 91731

ATTN: Mr. Allen Lyons, Chief  
New Vehicle/Engine Programs Branch

**RE: PROPOSED REGULATIONS FOR THE CALIFORNIA MOTOR  
VEHICLE SERVICE INFORMATION RULEMAKING**

Gentlemen:

Mutual Liquid Gas & Equipment Co., Inc. is an aftermarket company and service industry member.

Mutual Liquid Gas & Equipment Co., Inc. and the Western Propane Gas Association have worked together on OEM LPG engine and aftermarket fuel system certification projects.

In the past, independent service providers have not had ready access to the information and diagnostic tools to ensure the "host" vehicle for an aftermarket alternate fuel system is "healthy" prior to the installation of the alternative fuel system.

Aftermarket alternative fuel system manufacturers faced the same problems and were forced to "reverse engineer" alternative fuel control systems and vehicle integration.

CARB staff expects that OEM vehicle manufacturers will be able to organize and format OBD II descriptions in such a manner that the requirements of the regulations can be met without compromising "trade secret" information. If requests for information are routinely denied under the guise of "trade secrets" by the OEM vehicle manufacturers, the intent of Senate Bill 1146 will be seriously compromised.

How long after "petitioning" the Superior Court will an "order" take?

Continued.

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The CARB has been delegated authority which carries the same force of law as a court decision or legislation; why does a "trade secret" question or inquiry need to be passed along to a Superior Court? This process could be simplified and expedited by stopping the process at the decision of the "neutral hearing officer".

We believe the intent of Senate Bill 1146 will be enhanced by prompt and expedient handling of questions arising from the implementation of this important legislation.

Very truly yours,

MUTUAL LIQUID GAS & EQUIPMENT CO., INC.

A handwritten signature in cursive script that reads "Roger Wheeler". The signature is written in dark ink and is positioned above the printed name and title.

Roger Wheeler  
Technical Services Manager

RW/bb